Department of Toxic Substances Control

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CALIFORNIA ENVIRONMENTAL QUALITY ACT
MITIGATED NEGATIVE DECLARATION

Project Title:
SOIL REMEDIATION and a POST-CLOSURE PERMIT FOR EXPANSION of the UNIT ONE LANDFILL (CORRECTIVE ACTION MANAGEMENT UNIT)
USS-POSCO INDUSTRIES
900 Loveridge Road
Pittsburg, CA 94565

State Clearinghouse Number: 2002062026

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Project Location: 900 Loveridge Road, Pittsburg, CA 94565, Contra Costa County

Project Description:

In accordance with the California Health and Safety Code, Chapter 6.5, Section 25100 et seq., a RCRA Corrective Action remedy is being proposed by the Department of Toxic Substances Control (DTSC) at USS-POSCO Industries. As part of that remedy, UPI has submitted an application for a post-closure permit for a non-RCRA Corrective Action Management Unit (CAMU) to be located within the existing USS-POSCO plant. The area within the USS-POSCO plant site to be designated as a CAMU is Unit 1, a closed hazardous waste landfill within Site L-B. USS-POSCO has proposed creating the CAMU by expanding Unit 1 for wastes regulated by California as hazardous waste but not regulated by the United States Environmental Protection Agency (U.S. EPA)[1]. The landfill was closed and a post-closure maintenance plan was approved by DTSC on December 28, 1995.

1 In February 1993, the U.S. EPA issued the final rule for CAMUs, Corrective Action Provisions under Subtitle C (Federal Register, Volume 58, page 8658). California adopted regulations [California Code of Regulations, Title 22 (22 CCR), Division 4.5, Chapter 14, Section 66264.552] equivalent to the federal CAMU rule on June 29, l995.

USS-POSCO and DTSC entered into a Consent Agreement for implementation of RCRA Corrective Action at this facility in June 1998. Upon approval of the remedies for the SWMUs addressed by this project, a new consent agreement will be entered into between USS-POSCO and DTSC which will be updated to reflect the conditions and time constraints for implementing those remedies. In addition, the consent agreement will lay out the remaining steps required for remediation of SWMUs not addressed in this project and remediation of groundwater.

The planned CAMU (hereafter referred to as the Unit 1 CAMU, which will be authorized by the issuance of a Post-Closure Permit. The Unit 1 CAMU will receive materials/soils from only those SWMUs that: (1) have been shown not to be a threat to groundwater; and (2) have been tested to contain contaminants at levels below RCRA criteria for hazardous wastes and therefore not regulated by the U.S. Environmental Protection Agency. Materials/soils not meeting this criterion will be directed to appropriate off-site disposal facilities.

The project includes all corrective action, including excavation of soils/materials, transportation of soils/materials, opening and closing of the Unit 1 CAMU and the associated Post-Closure Permit, off-site disposal of certain wastes, deed restrictions, and post-closure maintenance of the Unit 1 CAMU. USS-POSCO submitted a RCRA Corrective Measures Study Workplan and Report to DTSC with proposed corrective action remedies for soils at this site. The RCRA Corrective Action Remedy Selection for soils remediation and post-closure maintenance project consists of the following activities:

1. **Reopening Unit 1, the CAMU, into which non-Resource Conservation and Recovery Act (non-RCRA) wastes from Sites L-A and SWMU No. 3 in the active portion of the facility will be placed for final disposal. A Post-Closure Permit is proposed for issuance to authorize the construction and operation of the CAMU.**

   Unit I will be expanded both laterally and vertically to accommodate the wastes from Sites L-A and SWMU No. 3 in the active portion of the facility. Lateral expansion will occur to the south over an approximate two-acre area, with a 50-foot set back from the fence line. The resulting Unit I CAMU footprint will be approximately 10 acres. Vertical expansion will be approximately 9 feet (el. 39.5 above sea level to el. 48.0), with side slopes lengthened by 50 feet on the south slope and by 60 feet on the north slope. Slope stability analysis will be in accordance with California Code of Regulations, Titles 22 and 27.

- The cap and vegetative cover will be removed from the Unit I landfill, and the Unit will be graded to provide for drainage from the unit by natural gravity flow toward the north and

west into the storm water retention basin (SWRB). Lined gutters will be installed so that stormwater collected will be conveyed down the side slopes of the Unit I CAMU in corrugated metal pipes. Stormwater run-off from the south side of the unit would be collected by a drainage channel and would drain from the south side of the unit around the southwest corner of the unit and from there to the north into the SWRB. An access road parallel to this drainage channel will also be constructed.

- An engineered cap for the Unit I CAMU will be installed. Following completion of remediation material/soil consolidation activities, remediation material/soil placed in the Unit I CAMU will be closed in place via construction of an engineered final cover consisting of, from bottom to top: a foundation layer (compacted dried sludge), a geosynthetic clay layer, a geosynthetic drainage layer, a filter fabric, and a vegetation/soil layer. The new geosynthetic layer will overlap, in a shingle effect, the remaining Unit I geosynthetic layer (in areas not receiving remediation material/soil) by a minimum of three feet;

- A final drainage system for the Unit I CAMU will be designed to perform three major functions:

    (1) facilitate the removal of precipitation on the closed Unit I CAMU in order to minimize infiltration and erosion of the final cover;

    (2) collect runoff from the Unit I CAMU in the existing SWRB to prevent the runoff from leaving the site area; and

    (3) divert drainage from adjacent areas to prevent run-on onto the Unit I CAMU closure area.

- New groundwater monitoring wells will be installed. These new wells and existing wells will be monitored to detect any impact to groundwater from the Unit 1 CAMU landfill.

2. Excavating contaminated material/soil from selected SWMUs located within the USS-POSCO plant Sites L-A and SWMU No. 3 in the active portion of the facility and transporting the excavated material/soil to the Unit I CAMU for disposal.

Approximately 95, 000 cubic yards of contaminated material/soil will be excavated from the following solid waste management units (SWMUs) for transfer to the Unit 1 CAMU:

- No. 3: Former Caustic Neutralization Area;
- No. 24.1: Site L-A – Dried Sludge Disposal Areas;
- No. 24.3: Site L-A – Lead Scale Disposal Area (East portion only);

- No. 24.5: Site L-A – Oil Disposal Areas (ODA #3); and
- No. 24.8: Site L-A – Lead Impacted Area.

- Remediation material/soil from the Dried Sludge Disposal Areas (SWMU 24.1) will be excavated and transported by truck directly to the Unit I CAMU (without stockpiling).

- Remediation material/soil from the remaining SWMUs will be excavated, stockpiled (for purposes of collecting and analyzing samples to verify that the remediation material/soil is not RCRA or containing any PCBs and then trucked to the Unit I CAMU.

- Remediation material/soil stockpiles will be placed on a plastic liner, surrounded by a berm, covered with plastic sheeting and secured, as necessary, with sandbags (or secured by other appropriate means).

3. Transport of wastes to appropriate off-site regulated treatment/disposal facilities.

- Material/soil from the remediation of the following SWMUs will be directed to appropriate off-site regulated treatment/disposal facilities:

- No. 17.1: Former Power Substation #1 Area; and
- No. 24.5: Site L-A – Oil Disposal Areas (ODA #1 and 4).

Remediation material/soil from these SWMUs will be excavated, stockpiled (for purposes of collecting and analyzing samples for waste profiling purposes), and then trucked to the off-site regulated treatment/disposal facilities. The approximate volume of each area is as follows:

- No. 24.3: Central Area – Site L-A Lead Scale Disposal Areas
- No. 17.1: Former Power Substation No. 1 Area: 21 cubic yards; and
- No. 24.5: Site L-A – Oil Disposal Areas #1: 100 cubic yards.

4. Post-Closure Maintenance of the Unit I CAMU

Post-closure maintenance, as specified in the Unit I Post-Closure Permit Application will be maintained throughout the CAMU post-closure period. Systems requiring maintenance will include: groundwater monitoring, final cover, drainage, and security. These systems will be inspected monthly.

Mitigation Measures:

Mitigation measures were incorporated into the project as described in the attached Initial Study to reduce impacts to less than significant levels. During the public comment period, the City of Pittsburg provided clarification to some of the mitigation measures it had proposed to be included into the draft permit for this project. The mitigation measures identified below reflect changes provided by the City of Pittsburg, and have been included in the final permit as conditions of project approval. Changes made are underlined.

Mitigation Measures during Remedial Activity: USS-POSCO shall perform the following mitigation measures:

- Regularly water all active construction areas and at access and haul roads at least twice daily;
- Cover all trucks hauling soil, sand, and other loose materials or require all trucks to maintain at least two feet of freeboard in all trucks, or employ other equivalent means (such as watering the top layer of materials exposed to short on-site haul distances) as may be approved by the BAAQMD;
- Pave, apply water three times daily, or apply (non-toxic) soil stabilizers on all unpaved access roads, parking areas and staging areas at the project site;
- Sweep daily (with water sweepers) all paved access roads, paved parking areas and paved staging areas at the project site;
- Sweep southbound lanes of Loveridge Road (from Site L-A entrance/exit point on Loveridge Road to the Pittsburg-Antioch Highway) at the end of each day (with water sweepers) during the off-haul of remediation soils;
- Hydroseed or apply (non-toxic) soil stabilizers to inactive construction areas (previously disturbed areas inactive for ten days or more), or employ other equivalent means (such as watering disturbed areas to maintain adequate moisture content) as may be approved by the BAAQMD;
- Enclose, cover, water twice daily or apply (non-toxic) soil binders to exposed stockpiles (dirt, sand, etc.);
- Limit traffic speeds on unpaved roads to 15 miles per hour;
- Install sandbags or other erosion control measures to prevent silt runoff to public roadways;
- Replant vegetation (hydroseed) in disturbed areas as quickly as possible (i.e., at least twice during Site L-A remediation activity and at the completion of the closure activity at the Unit I CAMU);
- Install wheel washers for all trucks, or manually wash off the tires or tracks of all trucks and equipment traveling between Site L-A and the Unit I CAMU on paved access roads;
- Suspend excavation and grading activity when winds (instantaneous gusts) exceed 25 miles per hour or operate in a manner such that visible dust emissions from all

excavation and grading activity does not exceed 0.5 on the Ringelmann chart, for a period or periods aggregating more than 3 minutes in any hour;
- Limit the area subject to excavation, grading, and other construction activity to two SWMUs or 10 acres (which ever is less) and the Unit I CAMU at any one time; Enforce a speed limit of not more than 15 miles per hour on unpaved roads and 30 miles per hour on paved roads within the UPI facility;
- Have on-site at all times, a site safety officer who is responsible for implementing the specific project construction SSHSP (signed by a Certified Industrial Hygienist and reviewed by UPI and/or its consultants for completeness) and implementing dust mitigation measures;
- Install appropriate air monitoring equipment as may be required by the BAAQMD;
- Limit personnel entrances into excavations;
- Limit the number of construction areas as well as limit access to those areas to approved personnel with adequate protective equipment; and
- Post signs at all project entry points or within 200 feet of project activities to warn the public and non-construction employees of hazardous activities at the project sites.

Mitigation Measures for Heavy Equipment: USS-POSCO shall, to the extent possible, implement the following mitigation measures to minimize the impacts of heavy equipment use:

- Use alternative fueled construction equipment;
- Minimize idling time, for example, 5-minute maximum;
- Maintain properly tuned equipment; and
- Limit the hours of operation of heavy-duty equipment as may be restricted by the City of Pittsburg and/or the amount of equipment in use as may be restricted by the BAAQMD).
- Limit the area subject to excavation, grading, and other construction activity to two SWMUs or 10 acres (which ever is less) and the Unit 1 CAMU at any one time;
- Post signs at all project entry points or within 200 feet of project activities to warn the public and non-construction employees of hazardous activities at the project sites.
- Limit the hours of operation of heavy-duty equipment (as may be restricted by the City of Pittsburg) and/or the amount of equipment in use (as may be restricted by the BAAQMD).

Findings of Significant Effect on Environment:

The Department of Toxic Substances Control (DTSC) has prepared an Initial Study pursuant to the requirements of the California Environmental Quality Act (CEQA, Section 21000 et seq., California Public Resources Code) and implementing Guidelines (Section 15000 et seq., Title 14, California Code of Regulations). Based upon this analysis, DTSC

has determined that the proposed project, with the mitigation measures adopted, will not have a significant effect upon the environment.

[Original signed by]		**09/26/02**
Andrew Berna-Hicks	**Project Manager**	**Date**

[Original signed by]		**09/26/02**
Mohinder S. Sandhu	**Chief, Permitting Branch**	**Date**